

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
UNITED STATES OF AMERICA )

v. )

Criminal No. 21-10104-PBS

VLADISLAV KLYUSHIN, )  
a/k/a "Vladislav Kliushin" )  
IVAN ERMAKOV, )  
a/k/a "Ivan Yermakov", and )  
NIKOLAI RUMIANTCEV, )  
a/k/a "Nikolay Rumyantcev" )

Defendants. )  
\_\_\_\_\_)

STIPULATION #2

The parties hereby stipulate and agree that defendant Vladislav Klyushin was married to Zhannetta Klyushina, who is also known as Zhanna Klyushina, at all times relevant to the charges in the Indictment. This stipulation is admissible in evidence.

Respectfully submitted,

VLADISLAV KLYUSHIN  
Defendant

RACHAEL S. ROLLINS  
United States Attorney

By: /s/ Maksim Nemtsev  
MAKSIM NEMTSEV  
MARC FERNICH  
Counsel for Defendant

/s/ Stephen E. Frank  
STEPHEN E. FRANK  
SETH B. KOSTO  
Assistant United States Attorneys

January 23, 2023